# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al.,1	Case No. 22-11068 (KBO)
Debtors.	(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

GATE TECHNOLOGY INCORPORATED, GATE GLOBAL, CORP., GATE INFORMATION PTE. LTD., and SUN YUNZHI,

Defendants.

FTX RECOVERY TRUST,

Plaintiff,

-against-

FORIS DAX MT LTD., FORIS DAX ASIA PTE. LTD., FORIS DAX, INC., and IRON BLOCK CAPITAL,

Defendants.

Adv. Pro. No. 24-50184 (KBO)

Adv. Pro. No. 24-50188 (KBO)

The last four digits of FTX Trading Ltd.'s FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

Plaintiffs,

- against -

AMERICAN ACTION NETWORK, INC.,

Adv. Pro. No. 24-50189 (KBO)

Defendant.

FTX RECOVERY TRUST,

Plaintiffs,

- against -

AMERICAN PROSPERITY ALLIANCE,

Defendant.

Adv. Pro. No. 24-50190 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

AMERICAN VALUES COALITION, INC.,

Defendant.

Adv. Pro. No. 24-50191 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

COMMON SENSE LEADERSHIP FUND, INC. a/k/a COMMONSENSE LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50192 (KBO)

Plaintiffs,

- against -

CONGRESSIONAL LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50193 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

Adv. Pro. No. 24-50197 (KBO)

FARMINGTON STATE CORPORATION (f/k/a FARMINGTON STATE BANK, d/b/a GENIOME BANK, d/b/a MOONSTONE BANK), FBH CORPORATION, and JEAN CHALOPIN,

Defendant.

FTX RECOVERY TRUST,

Plaintiffs,

- against -

NEW YORK SOLIDARITY NETWORK,

Defendant.

Adv. Pro. No. 24-50199 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

ONE NATION, INC.,

Adv. Pro. No. 24-50200 (KBO)

Defendant.

Plaintiffs,

- against -

PROSPERITY ALLIANCE, INC.,

Defendant.

Adv. Pro. No. 24-50201 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

SENATE LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50202 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

VOTO LATINO INC.,

Adv. Pro. No. 24-50203 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

Defendant.

- against -

WORKING AMERICA,

Adv. Pro. No. 24-50204 (KBO)

Defendant.

Plaintiffs,

- against -

SECUREBIO, INC. dba SECUREBIO,

Defendant.

Adv. Pro. No. 24-50211 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

THE GOODLY INSTITUTE dba GOODLY LABS,

Defendant.

Adv. Pro. No. 24-50212 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

SPARTZ PHILANTHROPIES, dba RETHINK CHARITY and NONLINEAR,

Defendant.

Adv. Pro. No. 24-50213 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

MANIFOLD MARKETS, INC,

Defendant.

Adv. Pro. No. 24-50214 (KBO)

Plaintiff,

-against-

DENG JUN, SHEN LING, TU JING, DENG DINGYUAN, DENG LAN, DENG JIAN, TU FAN, PAN YANG LIAN, HU JINGMING, HU SIFENG, YANG YUHUA, QIN YONG QIANG, HUANG YAO, DAI FUYANG, FU LING, CHEN CHAO, SHEN LIUGEN, LIN GUODONG, YANG YIBO, XU MIN, XU HONG, WAN JIAN, WU QIAO, WU TIANMING, LI PING, JIA SHUYUN, and JOHN DOES 1-20

Defendants.

FTX RECOVERY TRUST,

Plaintiff,

- against -

KUROSEMI INC.,

Defendant.

Adv. Pro. No. 24-50220 (KBO)

Adv. Pro. No. 25-50635 (KBO)

Plaintiff,

- against -

Adv. Pro. No. 25-50636 (KBO)

NFT STARS LIMITED,

Defendant.

AMENDED<sup>2</sup> NOTICE OF AGENDA FOR HEARING SCHEDULED FOR JUNE 25, 2025 AT 9:30 A.M. (ET), BEFORE THE HONORABLE KAREN B. OWENS AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Owens's Chambers Procedures (https://www.deb.uscourts.gov/content/judge-karen-b-owens) and the Court's website (http://www.deb.uscourts.gov/ecourt-appearances) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Owens's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.

### **ADJOURNED MATTERS:**

1. Motion for the Entry of an Order (I) Authorizing and Directing the Debtors to Return Certain Postpetition Cryptocurrency Deposits to D1 Ventures and (II) Granting Related Relief [D.I. 1584, filed on June 8, 2023]

Status: This matter is adjourned to a date to be determined.

2. Motion of Folkvang Ltd. for Entry of an Order (I) Authorizing Repurchase of Equity Interest in Folkvang Ltd. Held by Debtor Alameda Research Ltd., (II) Authorizing Folkvang Ltd.'s Repayment of Loan made by Debtor Maclaurin Investments Ltd., (III) Allowing Setoff of Repurchase and Repayment Amounts and (IV) Granting Related Relief [D.I. 30579, filed on June 2, 2025]

<sup>&</sup>lt;sup>2</sup> Amended items appear in bold.

Status: This matter is adjourned to the hearing scheduled for July 22, 2025.

3. Folkvang Ltd.'s Motion to File Under Seal Portions of (A) Motion of Folkvang Ltd. for Entry of An Order (I) Authorizing Repurchase of Equity Interest in Folkvang Ltd. held by Debtor Alameda Research Ltd., (II) Authorizing Folkvang Ltd.'s Repayment of Loan made by Debtor Maclaurin Investments Ltd., (III) Allowing Setoff of Repurchase and Repayment Amounts, and (IV) Granted Related Relief, and (B) Declaration of Michael Laurens Van Rossum in Support Thereof [D.I. 30580, filed on June 2, 2025]

Status: This matter is adjourned to the hearing scheduled for July 22, 2025.

#### ADJOURNED MATTERS – ADVERSARY PROCEEDINGS:

4. Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Gate Technology Incorporated et al., Adv. No. 24-50184 – Adv. D.I. 3, filed on December 13, 2024]

Status: This matter is adjourned to a date to be determined.

5. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Foris DAXMT Ltd. et al., Adv. No. 24-50188 – Adv. D.I. 3 & 4, filed on December 13, 2024]

Status: This matter is adjourned to a date to be determined.

6. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [FTX Recovery Trust v. Farmington State Corporation, Adv. No. 24-50197]

Status: This matter is adjourned to a date to be determined.

7. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [FTX Recovery Trust v. Prosperity Alliance, Inc., Adv. No. 24-50201 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to a date to be determined.

8. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. The Goodly Institute, Adv. No. 24-50212 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to the hearing scheduled for July 22, 2025.

9. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [FTX Recovery Trust v. Spartz Philanthropies, dba Rethink Charity et. al., Adv. No. 24-50213 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to a date to be determined.

- 10. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. American Action Network, Inc., Adv. No. 24-50189 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 11. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. American Prosperity Alliance, Adv. No. 24-50190 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 12. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. American Values Coalition, Inc., Adv. No. 24-50191 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 13. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Congressional Leadership Fund, Adv. No. 24-50193 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 14. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. New York Solidarity Network, Adv. No. 24-50199 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 15. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. One Nation, Inc., Adv. No. 24-50200 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 16. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Senate Leadership Fund, Adv. No. 24-50202 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 17. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Voto Latino Inc., Adv. No. 24-50203 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.

- 18. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Working America, Adv. No. 24-50204 Adv. D.I. 6, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 19. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Manifold Markets, Inc., Adv. No. 24-50214 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 20. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. SecureBio, Inc. dba SecureBio, Adv. No. 24-50211 Adv. D.I. 3, filed on November 26, 2024]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 21. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. Kurosemi Inc. Adv. No. 25-50635 Adv. D.I. 3, 4 & 5, filed on May 1, 23 & 30, 2025]
  - Status: This matter is adjourned to the hearing scheduled for July 22, 2025.
- 22. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Recovery Trust v. NFT Stars Limited Adv. No. 25-50636 Adv. D.I. 3, filed on May 1, 2025]
  - <u>Status</u>: The FTX Recovery Trust intends to file a request for default against the defendant for failure to appear. Accordingly, a pretrial conference is no longer needed.
- 23. Summons and Notice of Pretrial Conference in an Adversary Proceeding [FTX Trading Ltd. v. Jun et al., Adv. No. 24-50220]
  - <u>Status</u>: The FTX Recovery Trust intends to file a request for default against the defendant for failure to appear. Accordingly, a pretrial conference is no longer needed.

### **RESOLVED MATTERS:**

- 24. FTX Recovery Trust's One Hundred Sixty-First (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor [D.I. 30299 & 30325, filed on April 28, 2025]
  - <u>Status</u>: On June 20, 2025, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.
- 25. FTX Recovery Trust's One Hundred Sixty-Second (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 30300 & 30326, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

26. FTX Recovery Trust's One Hundred Sixty-Third (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30301 & 30327, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

27. FTX Recovery Trust's One Hundred Sixty-Fourth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30302 & 30328, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

28. FTX Recovery Trust's One Hundred Sixty-Fifth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30303 & 30329, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

29. FTX Recovery Trust's One Hundred Sixty-Sixth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30304 & 30330, filed on April 28, 2025]

<u>Status</u>: On June 20, 2025, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.

30. FTX Recovery Trust's One Hundred Sixty-Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30305 & 30331, filed on April 28, 2025]

<u>Status</u>: On June 20, 2025, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.

- 31. FTX Recovery Trust's One Hundred Sixty-Eighth (Non-Substantive) Omnibus Objection to Certain Partially Unliquidated Proofs of Claim (Customer Claims) [D.I. 30306 & 30332, filed on April 28, 2025]
  - <u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 32. FTX Recovery Trust's One Hundred Sixty-Ninth (Substantive) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim (Customer Claims) [D.I. 30307 & 30333, filed on April 28, 2025]
  - <u>Status</u>: On June 20, 2025, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.
- 33. FTX Recovery Trust's One Hundred Seventieth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 30308 & 30334, filed on April 28, 2025]
  - <u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 34. FTX Recovery Trust's One Hundred Seventy-First (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor [D.I. 30309 & 30335, filed on April 28, 2025]
  - <u>Status</u>: On June 20, 2025, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required.
- 35. FTX Recovery Trust's One Hundred Seventy-Second (Substantive) Omnibus Objection to Certain No Liability Claims (Customer Claims) [D.I. 30310 & 30336, filed on April 28, 2025]
  - <u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 36. FTX Recovery Trust's One Hundred Seventy-Third (Non-Substantive) Omnibus Objection to Certain Late Filed Claims (Customer Claims) [D.I. 30313 & 30337, filed on April 28, 2025]
  - Status: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to

file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

37. FTX Recovery Trust's One Hundred Seventy-Fourth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 30314 & 30338, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

38. FTX Recovery Trust's One Hundred Seventy-Fifth (Substantive) Omnibus Objection to Certain Misclassified Claims (Customer Claims) [D.I. 30315 & 30339, filed on April 28, 2025]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the FTX Recovery Trust received responses. The FTX Recovery Trust intends to file a revised form of order to reflect such adjournments under certification of counsel. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

39. Motion of the FTX Recovery Trust for Entry of an Order Extending the Deadline to Object to Requests for Payment of Administrative Claims [D.I. 30361, filed on May 5, 2025]

<u>Status</u>: On June 23, 2024, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

40. Motion of the FTX Recovery Trust and the Separate Subsidiaries for Entry of a Final Decree (I) Closing the Chapter 11 Cases of the Consolidated Debtors and (II) Closing the Chapter 11 Cases of the Separate Subsidiaries on the Applicable Closing Date [D.I. 30629, filed on June 4, 2025]

<u>Status</u>: On June 24, 2024, the Court entered an order granting the requested relief. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

### **MATTERS GOING FORWARD:**

41. Debtors' Objection to Proof of Claim filed by Ross Rheingans-Yoo [D.I. 3409, filed on October 30, 2023]

Objection Deadline: November 13, 2023 at 4:00 p.m. (ET)

### Responses Received:

- A. Ross Rheingans-Yoo's Response to Debtors' Objection to Claim No. 5166 [D.I. 3737, filed on November 13, 2023]
- B. Ross Rheingans-Yoo's Supplemental Response to Debtors' Objection to Claim No. 5166 [D.I. 29572, filed on February 12, 2025]

#### Related Documents:

- A. Declaration of Stephanie G. Wheeler in Support of Debtors' Objection to Ross Rheingans-Yoo's Proof of Claim [D.I. 3410, filed October 30, 2023]
- B. Stipulation of Undisputed Facts Relating to Ross Rheingans-Yoo's FDU Claim [D.I. 29218, filed on January 15, 2025]
- C. Reply of FTX Recovery Trust in Further Support of Debtors' Objection to Ross Rheingans-Yoo's Claim [D.I. 30712, filed on June 12, 2025]

Status: This matter is going forward.

42. Motion to Extend Time to Complete KYC Requirements [D.I. 30432, filed on May 16, 2025]

Objection Deadline: June 18, 2025 at 4:00 p.m. (ET)

# Responses Received:

A. Objection of the FTX Recovery Trust to Motion to Extend Time to Complete KYC Requirement [D.I. 30898, filed on June 18. 2025]

#### Related Documents:

- A. Motion to Appear Remotely Via Video Conference [D.I. 30433, filed on May 16, 2025]
- B. Silvio Pop Letter Regarding Objection to Transfer of Claim No. 6304 & 80161 [D.I. 29870, filed on March 5, 2025]

Status: This matter is adjourned to the hearing scheduled for July 22, 2025.

43. Motion to Appear Remotely Via Video Conference [D.I. 30433, filed om May 16, 2025]

Objection Deadline: June 18, 2025 at 4:00 p.m. (ET)

# Responses Received:

A. Objection of the FTX Recovery Trust to Motion to Appear Remotely Via Video Conference [D.I. 30899, filed on June 18, 2025]

### Related Documents:

A. Motion to Extend Time to Complete KYC Requirements [D.I. 30432, filed on May 16, 2025]

B. Silvio Pop Letter Regarding Objection to Transfer of Claim No. 6304 & 80161 [D.I. 29870, filed on March 5, 2025]

**Status:** This matter is adjourned to the hearing scheduled for July 22, 2025.

# **MELAMED CLAIM OBJECTION:**

44. Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 28643, filed on December 9, 2024]

Objection Deadline: April 7, 2025 at 4:00 p.m. (ET)

# Responses Received:

A. Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30077, April 7, 2025]

# **Related Documents:**

- A. Declaration of Henry Anthony Chambers in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination [D.I. 28645, filed by December 9, 2024]
- B. Declaration of Taro Tanaka [D.I. 28646, filed by December 9, 2024]
- C. Notice of Rescheduled Hearing Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29397, filed on January 27, 2025]
- D. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29591, filed on February 17, 2025]
- E. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29707, filed on February 24, 2025]
- F. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29800, filed on February 28, 2025]
- G. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29886, filed on March 7, 2025]

- H. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29933, filed on March 14, 2025]
- I. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30009, filed on March 27, 2025]
- J. Declaration of Ryo Kawabata [D.I. 30078, filed on April 7, 2025]
- K. Declaration of Takane Hori [D.I. 30079, filed on April 7, 2025]
- L. Declaration of Takane Hori in Support of Payment of Post Petition Director's Fees [D.I. 30080, filed on April 7, 2025]
- M. Declaration of Seth Melamed in Support of Opposition to Debtors' Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30081, filed on April 7, 2025]
- N. Notice of Cross-Motion to Compel Arbitration [D.I. 30288, April 23, 2025]
- O. FTX Recovery Trust's Reply in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination and Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30364, filed on May 7, 2025]
- P. Declaration of Balakrishnan Ashok Kumar in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30365, filed on May 7, 2025]
- Q. Declaration of Henry Anthony Chambers in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30366, filed on May 7, 2025]
- R. Declaration of Taro Tanaka in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30367, filed on May 7, 2025]

Status: This matter is going forward in the afternoon session at 1:30 p.m. (ET).

45. Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30077, April 7, 2025]

Objection Deadline: May 7, 2025 at 4:00 p.m. (ET)

# Responses Received: None

# Related Documents:

- A. Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 28643, filed on December 9, 2024]
- B. Declaration of Henry Anthony Chambers in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination [D.I. 28645, filed by December 9, 2024]
- C. Declaration of Taro Tanaka [D.I. 28646, filed by December 9, 2024]
- D. Notice of Rescheduled Hearing Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29397, filed on January 27, 2025]
- E. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29591, filed on February 17, 2025]
- F. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29707, filed on February 24, 2025]
- G. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29800, filed on February 28, 2025]
- H. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29886, filed on March 7, 2025]
- I. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29933, filed on March 14, 2025]
- J. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30009, filed on March 27, 2025]
- K. Declaration of Ryo Kawabata [D.I. 30078, filed on April 7, 2025]
- L. Declaration of Takane Hori [D.I. 30079, filed on April 7, 2025]
- M. Declaration of Takane Hori in Support of Payment of Post Petition Director's Fees [D.I. 30080, filed on April 7, 2025]

- N. Declaration of Seth Melamed in Support of Opposition to Debtors' Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30081, filed on April 7, 2025]
- O. Notice of Cross-Motion to Compel Arbitration [D.I. 30288, April 23, 2025]
- P. FTX Recovery Trust's Reply in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination and Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30364, filed on May 7, 2025]
- Q. Declaration of Balakrishnan Ashok Kumar in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30365, filed on May 7, 2025]
- R. Declaration of Henry Anthony Chambers in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30366, filed on May 7, 2025]
- S. Declaration of Taro Tanaka in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30367, filed on May 7, 2025]
- T. Reply in Support of Melamed's Cross-Motion to Compel Arbitration [D.I. 30900, filed on June 18, 2025]

Status: This matter is going forward in the afternoon session at 1:30 p.m. (ET).

Dated: June 24, 2025 Wilmington, Delaware

#### LANDIS RATH & COBB LLP

### /s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

#### SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street

New York, NY 10004 Telephone: (212) 558-4000 Facsimile: (212) 558-3588

E-mail: dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com jensenc@sullcrom.com

Counsel for the FTX Recovery Trust